

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                     |   |                             |
|---------------------|---|-----------------------------|
| IN RE:              | ) | Chapter 11                  |
|                     | ) |                             |
| ZEUS CONCEPTS, LLC, | ) | Case No. 07 B 10880         |
|                     | ) |                             |
| Debtor.             | ) | Hon. Susan Pierson Sonderby |

**NOTICE OF MOTION**

TO: See Attached Service List

**PLEASE TAKE NOTICE THAT** on November 25, 2009, at 10:00 a.m., I shall appear before the Honorable Susan Pierson Sonderby, or any other judge sitting in her stead, in Room 642, 219 South Dearborn Street, Chicago, Illinois, and request a hearing on the Debtor's Motion To Enter Final Decree and Close Chapter 11 Case, a copy of which is attached hereto and hereby served upon you.

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, hereby state that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on the 6<sup>th</sup> day of November, 2009.

/s/ Gregory K. Stern

Gregory K. Stern

Gregory K. Stern (Atty. ID #6183380)  
Monica C. O'Brien (Atty. ID #6216626)  
James E. Hausler (Atty. ID #6292973)  
Christina M. Riepel (Atty. ID #6297514)  
53 West Jackson Boulevard  
Suite 1442  
Chicago, Illinois 60604  
(312) 427-1558

SERVICE LIST

**Registrants Served Through The Court's Electronic Notice For Registrants**

William Neary, United States Trustee  
219 South Dearborn Street,  
Suite 873  
Chicago, Illinois 60604

**Parties Served US Mail**

Zeus Concepts, LLC  
1356 Shermer Road, 2<sup>nd</sup> Floor  
Northbrook, Illinois 60062

Brian Press, Esq.  
Associate Area Counsel  
200 West Adams Street  
Suite 2300  
Chicago, Illinois 60606

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**MOTION TO ENTER FINAL DECREE AND CLOSE CHAPTER 11 CASE**

Now comes Zeus Concepts, LLC, Debtor and Debtor In Possession, by and through its attorneys, Gregory K. Stern, Monica C. O'Brien, James E. Hausler and Christina M. Riepel, and in support of its Motion to Enter Final Decree and Close Chapter 11 Case, pursuant to 11 U.S.C. §350 and Bankruptcy Rule 3022, states as follows:

1. On June 18, 2007, Zeus Concepts, LLC (the "Debtor"), filed a Voluntary Petition for relief under Chapter 11 of the Bankruptcy Code.

2. On June 4, 2009, an Order Approving Disclosure Statement was entered, and on August 18, 2009 an Order Confirming Chapter 11 Plan (the "Confirmation Order") was entered.

3. The Confirmation Order provides that the Debtor's Chapter 11 Plan (the "Plan") has been accepted by an impaired class (Class 2 unsecured creditors having voted their acceptance of the plan); the Plan satisfies the requirements of Bankruptcy Code §1129(b); the Plan complies with the applicable provisions of Title 11 and has been proposed in good faith and not by any means forbidden by law; the Plan is feasible in that the Confirmation Order is not likely to be followed by the need for further financial reorganization; and, the Debtor has made all payments required by the United States Trustee.

4. The Debtor's estate has been fully administered as a result of the entry of the Confirmation Order. The Confirmation Order is final and not subject to appeal.

5. On September 17, 2009, the Debtor distributed the dividend required by the Plan to Class 2 unsecured creditors and no other distributions are provided for in the Plan for Class 2 unsecured creditors.

6. There are no remaining contested matters pending and no further steps need be taken to facilitate the administration of the Plan Of Liquidation.

WHEREFORE, Zeus Concepts, LLC, the Debtor, prays for an order as follows:

- (a) Granting the Motion To Enter Final Decree and Close Chapter 11 Case pursuant to §350 and Bankruptcy Rule 3022;
- (b) Entering Final Decree closing the Debtor's Chapter 11 case; and,
- (c) For such other relief as may be just.

/s/ Gregory K. Stern  
Gregory K. Stern, Debtor's Attorney

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